

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

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KLEIMAR, N.V.,

Plaintiff,

against

DALIAN DONGZHAN GROUP CO., LTD.  
BENXI BEIYING IRON AND STEEL GROUP  
IMPORT AND EXPORT CORP. LTD.,  
BEIGANG HONG KONG LIMITED, and  
BEITAI IRON & STEEL GROUP CO., LTD.,

Defendants.  
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ECF CASE

16 CV 9486 (AJN) (DCF)

**ANSWER OF  
GARNISHEE MACSTEEL  
INTERNATIONAL  
USA CORP. TO FIFTH  
SERVED WRIT OF  
GARNISHMENT BY  
KLEIMAR, N.V.**

TO THE MARSHALL OF THE UNITED STATES DISTRICT COURT FOR THE  
SOUTHERN DISTRICT OF NEW YORK:

Pursuant to Rule B(3)(a) of the Supplemental Rules for Certain Admiralty and Maritime Claims

of the Federal Rules of Civil Procedure and in response to a certain Process of Maritime

Attachment and Garnishment in the above-captioned matter dated January 9, 2017, and served

upon Garnishee MACSTEEL INTERNATIONAL USA CORP. ("MACSTEEL") on or about

February 15, 2017, Garnishee MACSTEEL hereby states that on such date of service, it was not

indebted to the Defendants DALIAN DONGZHAN GROUP CO., LTD., BENXI BEIYING

IRON AND STEEL GROUP, IMPORT AND EXPORT CORP. LTD., BEIGANG HONG

KONG LIMITED, or BEITAI IRON & STEEL GROUP CO., LTD (collectively, "Defendants"),

and did not otherwise have in its possession any property, tangible or intangible, including funds,

assets, cash, good, chattels, credits, effects, debts, owed by or owed to the Defendant(s) or

monies to be paid to discharge a debt owed to the Defendant(s), including monies being

transferred by, to or for the benefit of the Defendant(s).

Dated: New York, New York  
February 27, 2017

DLA PIPER LLP (US)

By: /s/ Neal Kronley  
Kiera S. Gans  
[kiera.gans@dlapiper.com](mailto:kiera.gans@dlapiper.com)  
Neal F. Kronley  
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*Attorneys for Garnishee  
Macsteel International USA Corp.*

**VERIFICATION**

STATE OF NEW YORK     )  
  ) ss:  
COUNTY OF NEW YORK    )

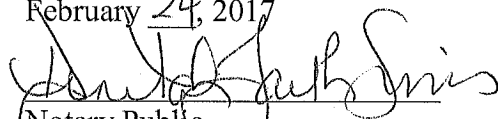
Margo Rosner Marks, being duly sworn, deposes and says as follows:

I am the Managing Director for Macsteel International USA Corp. ("Macsteel"). I have reviewed the contents of the foregoing ANSWER OF GARNISHEE MACSTEEL INTERNATIONAL USA CORP. TO FIFTH SERVED WRIT OF GARNISHMENT BY KLEIMAR, N.V. in Docket No. 16 Civ. 09486(AJN) and know the contents thereof and that the same are true to Macsteel's files, and communications with relevant employees of the company.



\_\_\_\_\_  
Margo Rosner Marks

Sworn to before me on  
February 24, 2017

  
\_\_\_\_\_  
Notary Public

**CERTIFICATE OF SERVICE**

I, Neal Kronley, hereby certify that on the 27th day of February, 2017, I caused the foregoing ANSWER OF GARNISHEE MACSTEEL INTERNATIONAL USA CORP. TO FIFTH SERVED WRIT OF GARNISHMENT BY KLEIMAR, N.V. to be served by ECF and email upon:

Kevin J. Lennon, Esq.  
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klennon@lmpaw.net  
*Counsel for Plaintiff*

/s/ Neal Kronley  
Neal F. Kronley